

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

UNITED STATES OF AMERICA)

Plaintiff,)

vs.)

DION LEVERING WILLIAMS)

Defendant.)

Criminal No. 3:12cr47-HEH

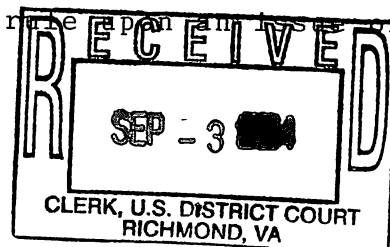
Civil No. 3:14cv342

DEFENDANT'S REPLY TO GOVERNMENT RESPONSE
TO DION WILLIAMS MOTION UNDER 28 U.S.C. 2255

COMES NOW Defendant, Dion Williams pro se and acting on his own behalf, and appears before this honorable court under the less stringent standards provided by Haines v. Kerner 404 US 519 30 L. Ed 2d 652 (1972), and moves this court to accept his as an informal reply, and allow movant/defendant to supplement his reply if the Government provides a furnish affidavit from movant's counsel, Mr. Kenneth Ravenell, disputing movant's factual claims noted his § 2255 pleading.

As to the furnish affidavit by Williams/movant's co-counsel movant agrees that those communications to file an appeal would not be convey between movant and local counsel.

Movant believes it is disingenuous to rely upon an affidavit from local counsel as a factual basis to rule upon an issue of



constitutional magnitude when all evidence, including the affidavit itself clearly acknowledges that movant did not even consult with local counsel regarding representation or assistance in the underlying criminal matter.

Movant never discussed appeal or any aspect of the case with local counsel, nor did he ever suggest that this the situation since local counsel had disclosed to movant that he had no experience with federal cases or procedures and therefore movant did not, nor would have discussed appeal with local counsel at such an early date, or at all.

Moreover, should the Government provide an affidavit from movant's counsel, Mr. Kenneth Ravenell, then Movant should have an opportunity to respond or reply to such affidavit if any, since movant and this court are unaware as to if the Government will submit such an affidavit, or what such affidavit might contain.

It is expected and anticipated that any such affidavit from Mr. Ravenell would clearly and completely support movant's assertions and support movant's motion under §2255, however neither movant nor this court can base any reply or ruling on conjecture.

Therefore movant respectfully requests this court to grant the relief sought herein, and allow movant to supplement his reply if or when the Government provides any such affidavits or information.

Respectfully submitted on this 25th day of August, 2014.

Dion L. Williams

Dion Levering Williams
Movant pro se
Federal Correctional Institution
La Tuna
P.O. Box 3000
Anthony TX 88021

AFFIDAVIT

I declare under the penalties of perjury that the foregoing is true and correct and that this reply under title 28 United States code section 2255 and according to the federal rules of civil procedure was placed in the prison mailing system on this day of August, 2014.

Dion Williams

Dion Levering Williams, pro se


Counselor U. Alexand

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of August, 2014, the foregoing REPLY under title 28 U.S.C. § 2255 to vacate, set aside or correct a sentence by a person in Federal Custody was served on Jamie L. Mickelson, Esq, and Peter Duffy, Esq, Office of the United States Attorney, 600 East Main Street, Suite 1800, Richard Virginia, 23219, mailed first class mail, postage pre-paid pursuant to Houston v. Lack, 487 US 266 (1988).

I further certify that on the above listed date, I placed in the prison mailing system (mailbox rule) to the Clerk of the Court for the eastern district of Virginia, Richmond division by placing same in a pre-paid postage sealed envelope and depositing same in the prison mailbox for outgoing mail pursuant to Houston v. Lack.

I certify the the foregoing is true and correct pursuant to 28 U.S.C. section 1746 to the best of my knowledge and belief.



Dion Levering Williams.

